

USDC SDNY

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THE LAW OFFICES OF SEAN M. MAHER, PLLC

VIA ECF

Hon. Vincent L. Briccetti
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Dayshawn Rivers*, 22 Cr. 485 (VB)
Change of residence bail condition modification request

Dear Judge Briccetti:

On behalf of defendant Dayshawn Rivers, I write to request that the Court modify Mr. Rivers' bail conditions to permit him to change residences. Currently, Mr. Rivers is on pretrial release with conditions including home detention with electronic monitoring. Mr. Rivers is living with Ms. Devonne Watkins and their minor daughter.

Ms. Watkins has relayed that she receives government assistance for her housing and that she is concerned about her housing status being at risk because Mr. Rivers is not on her housing lease. Mr. Rivers does not want to jeopardize the housing of Ms. Watkins and their child, so he is requesting permission to change residences. His proposal is to move in with his sister Tariah Boynton. Both Pretrial Services Officer Leo Barrios and I have spoken with Ms. Boynton and she confirms that she gives permission for Mr. Rivers to move in with her as per the terms of his release conditions. Ms. Boynton is a non-armed correctional officer with the New York State Department of Corrections. She lives in Mt. Vernon with her three children. Ms. Boynton's address has been provided to the government and to the Pretrial Services Office.

I have relayed this request to both the Pretrial Services Office and the government. PTS Off. Leo Barrios has informed me that he has no objection to the proposed change of residence. AUSA Kaiya Arroyo has informed me that the government defers to the position of the Pretrial Services Office and thus has no objection.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/S/

Sean M. Maher

Counsel for Dayshawn Rivers

cc: All counsel via ECF

2796 SEDGWICK AVENUE, SUITE C1, BRONX, NEW YORK 10468
(212) 661-5333 • (347) 548-9959 FAX
WWW.SEANMAHERLAW.COM

April 10, 2024

APPLICATION GRANTED
SO ORDERED:

Vincent L. Briccetti, U.S.D.J.

Dated: 4/10/24

White Plains, NY

Bail modified to ~~prohibit~~ permit
defendant to live at Tariah
Boynton's residence. All other
bail conditions remain
the same.